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Attorneys for Secured Creditor  
ARCHWAY BROADWAY LOAN SPE, LLC

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re  
SEATON INVESTMENTS, LLC, *et al.*,  
  
Debtors and Debtors-in-  
Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;  
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;  
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and  
2:24-bk-12076-VZ

Affects:

Chapter 11

- ☐ All Debtors  
☐ Seaton Investments, LLC  
☐ Colyton Investments, LLC  
☐ Broadway Avenue Investments, LLC  
☐ SLA Investments, LLC  
☐ Negev Investments, LLC  
☒ Alan Gomperts  
☒ Daniel Halevy  
☒ Susan Halevy

**STIPULATION TO GRANT ARCHWAY  
BROADWAY LOAN SPE, LLC'S  
MOTION FOR RELIEF FROM  
AUTOMATIC STAY TO PROCEED IN  
NON-BANKRUPTCY FORUM AND TO  
WITHDRAW OBJECTION TO  
EMPLOYMENT OF SAUL EWING LLP**

**Hearing on Relief from Stay Motion:**

Date: January 7, 2025  
Time: 10:30 a.m.  
Crtrm.: 1368

**Hearing on Employment Application:**

Date: January 9, 2025  
Time: 10:00 a.m.  
Crtrm.: 1368

Hon. Vincent P. Zurzolo

Secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability company, successor in interest to Archway Real Estate Income Fund I REIT, LLC (“Archway”), on the one hand, and the jointly-administered debtors, Seaton Investments, LLC (“Seaton”), Colyton Investments, LLC (“Colyton”), Broadway Avenue Investments, LLC (“Broadway”), SLA Investments, LLC (“SLA”), and Negev Investments, LLC (“Negev” and collectively with Seaton, Colyton, Broadway and SLA, the “Corporate Debtors”) and Alan Gomperts (“Mr. Gomperts”), Daniel Halevy (“Mr. Halevy”), and Susan Halevy (“Ms. Halevy” and collectively with Mr. Gomperts and Mr. Halevy, the “Individual Debtors” and collectively with the Corporate Debtors, the “Debtors”), on the other hand, by and through respective counsel, stipulate and agree as follows:

#### RECITALS

A. On November 6, 2024, proposed counsel to the Defendants filed a *Notice of Supplement and Supplement to Application of Individual Debtors and Debtors-in-Possession to Expand Scope of Employment Application of Saul Ewing LLP as General Bankruptcy Counsel* (“Employment Application”) (Dkt. 285).

B. On November 20, 2024, Archway filed an objection (“Employment Objection”) (Dkt. 303) to the Employment Application.

C. On December 17, 2024, Archway filed a *Motion for Relief from Automatic Stay to Proceed in a Non-Bankruptcy Forum* (“MRAS”) (Dkt. 357). The MRAS seeks permission, among other things, to proceed in a non-bankruptcy forum against Defendants Ms. Halevy in her capacity as Trustee of the Halevy Family Trust Dated September 8, 2010; 341 South Cannon LLC, a California limited liability company (“Cannon LLC”); Daniel Halevy, in his capacity as Personal Representative of the estate of non-debtor David Halevy, Deceased (“Mr. Halevy” and collectively, the “Defendants”).

D. On December 17, 2024, proposed counsel to the Defendants filed a *Notice of Hearing on the Employment Application*, setting a hearing for January 9, 2025. *See* Dkt. 358.

E. The parties have since discussed a consensual resolution to the MRAS and the Employment Objection.

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LOS ANGELES, CALIFORNIA 90017-2427  
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**STIPULATION**

WHEREFORE, based on the Recitals, which are true and correct and are incorporated herein, the parties stipulate and agree as follows:

1. Archway requests, and the Individual Debtors do not object, that its MRAS be granted and that the Court enter the form of order attached as Exhibit 1 ("MRAS Order") and vacate the hearing on the MRAS.

2. Archway's objection to the Employment Application shall, upon entry of the MRAS Order, be deemed withdrawn, and accordingly the Court should enter an order granting the Employment Application and vacating the hearing on such Employment Application.

3. Archway may proceed, as requested in the MRAS, in a non-bankruptcy forum, and the Defendants shall, and hereby do, agree that their counsel (Saul Ewing LLC assuming it is employed for such representation) shall accept service of process via email of the Complaint, Summons, ADR packet, case management conference, and all other documents required to be served in connection with the commencement of such actions. Such service shall be deemed effective upon sending of the email to the Defendants' counsel. In turn, Archway agrees to permit the Defendants a 30-day extension of their deadline to respond to such Complaint in the non-bankruptcy forum.

**SO STIPULATED.**

DATED: December 18, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

By: /s/ Gerrick M. Warrington  
GERRICK M. WARRINGTON  
Attorneys for  
Archway Broadway Loan SPE, LLC

FRANDZEL ROBINS BLOOM & CSATO, L.C.  
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR  
LOS ANGELES, CALIFORNIA 90017-2427  
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1 DATED: December 24, 2024

SAUL EWING LLP

By:



ZEV SHECHTMAN

RYAN COY

Attorneys for the Individual Debtors

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# Exhibit 1

Exhibit 1

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael Gerard Fletcher (State Bar No. 70849) Gerrick M. Warrington (State Bar No. 294890) FRANDZEL ROBINS BLOOM & CSATO, L.C. 1000 Wilshire Boulevard, 19 <sup>th</sup> Floor Los Angeles, CA 90017-2427 Telephone: (323) 852-1000 Facsimile: (323) 651-2577 Email: mfletcher@frandzel.com; gwarrington@frandzel.com  <input type="checkbox"/> <i>Movant appearing without an attorney</i> <input checked="" type="checkbox"/> <i>Attorney for Movant</i>	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  SEATON INVESTMENTS, LLC, et al.,  Debtors and Debtors-in-Possession.  Affects:  <input type="checkbox"/> All Debtors <input type="checkbox"/> Seaton Investments, LLC <input type="checkbox"/> Colyton Investments, LLC <input type="checkbox"/> Broadway Avenue Investments, LLC <input type="checkbox"/> SLA Investments, LLC <input type="checkbox"/> Negev Investments, LLC <input type="checkbox"/> Alan Gomperts <input checked="" type="checkbox"/> Daniel Halevy <input checked="" type="checkbox"/> Susan Halevy  Debtor(s).	Lead Case No. 2:24-bk-12079-VZ  Jointly Administered with Case Nos.:  2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ; 2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and 2:24-bk-12076-VZ  <b>ORDER GRANTING MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (Action in Nonbankruptcy Forum)</b>  DATE: January 7, 2025 TIME: 10:30 a.m. COURTROOM: 1368 PLACE: 255 East Temple Street, Los Angeles, CA 90012
<b>MOVANT:</b> ARCHWAY BROADWAY LOAN SPE, LLC	

1. The Motion was: ☐ Opposed ☐ Unopposed ☒ Settle by stipulation

2. The Motion affects the following Nonbankruptcy Action:

Name of Nonbankruptcy Action: In re Halevy, David ("Decedent") ("Probate Action")

Docket number: 24STPB01963

Nonbankruptcy court or agency where the Nonbankruptcy Action is pending:

Los Angeles Superior Court

3. The Motion is granted under 11 U.S.C. § 362(d)(1).
4. As to Movant, its successors, transferees and assigns, the stay of 11 U.S.C. § 362(a) is:
- ☒ Terminated as to the Debtor and the Debtor's bankruptcy estate.
  - ☐ Modified or conditioned as set forth in Exhibit \_\_\_\_\_ to the Motion.
  - ☒ Annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant to enforce its remedies regarding the nonbankruptcy action do not constitute a violation of the stay.
5. **Limitations on Enforcement of Judgment:** Movant may proceed in the nonbankruptcy forum to final judgment (including any appeals) in accordance with applicable nonbankruptcy law. Movant is permitted to enforce its final judgment only by (*specify all that apply*):
- ☐ Collecting upon any available insurance in accordance with applicable nonbankruptcy law.
  - ☒ Proceeding against the Debtor as to property or earnings that are not property of this bankruptcy estate.
6. This order is binding and effective despite any conversion of this bankruptcy case to a case under any other chapter of the Bankruptcy Code.
7. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified or annulled as to the co-debtor, on the same terms and conditions as to the Debtor.
8. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
9. ☐ This order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the nonbankruptcy action.
10. ☐ This order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice.
11. ☒ Other (*specify*): The stay is terminated as to the Debtors and their estates to permit Movant Archway Broadway Loan SPE, LLC to proceed (i) in the Probate Action to seek relief and obtain orders and rulings on Movant's deemed-rejected creditor's claim against the Decedent's Estate; (ii) to commence and prosecute fully its causes of action to judgment, post-judgment, and appeals, if any, against Defendants Susan Halevy ("Ms. Halevy") in her capacity as Trustee of the Halevy Family Trust Dated September 8, 2010 ("Trust"); 341 South Cannon LLC, a California limited liability company ("Cannon LLC"); Daniel Halevy, in his capacity as Personal Representative of the estate of non-debtor David Halevy, Deceased ("Mr. Halevy" and collectively, the "Defendants"); and (iii) to enforce any such judgment against the Defendants, including any non-debtors and non-bankruptcy-estate property and including Ms. and Mr. Halevy, but only in their non-individual capacities as Trustee of the Trust and/or Personal Representative of the Decedent's probate estate, not in their individual capacities and not against their property or property of these jointly-administered bankruptcy estates, absent further order of this Court.

###

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, CA 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION TO GRANT ARCHWAY BROADWAY LOAN SPE, LLC'S MOTION FOR RELIEF FROM AUTOMATIC STAY TO PROCEED IN NON-BANKRUPTCY FORUM AND TO WITHDRAW OBJECTION TO EMPLOYMENT OF SAUL EWING LLP will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 12/24/24 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

- Counsel to Party in Interest: Scott R Albrecht salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- Counsel to KDM: Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;laddocketing@polsinelli.com
- Counsel to Party in Interest: Jacquelyn H Choi jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Counsel to Individual Debtors: Carol Chow Carol.Chow@saul.com, easter.santamaria@saul.com
- Counsel to Party in Interest: Robert F Conte robert.conte@usdoj.gov, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov
- Counsel to Individual Debtors: Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com
- Counsel to Party in Interest: Christopher Cramer secured@becket-lee.com
- Counsel to Party in Interest: Christopher Crowell ccrowell@hrhlaw.com
- Counsel to Individual Debtors: Turner Falk turner.falk@saul.com, tnfalk@recap.email
- Counsel to Archway: Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Counsel to Party in Interest: Todd S. Garan ch11ecf@aldridgepite.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepite.com
- Counsel to Party in Interest: Richard Girgado rgirgado@counsel.lacounty.gov
- Counsel to Party in Interest: Jacqueline L James jjames@hrhlaw.com
- Trial Counsel to U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel to Party in Interest: Avi Edward Muhtar amuhtar@crowandstonelaw.com
- Counsel to Archway: Bruce D Poltrock bpoltrock@frandzel.com, achase@frandzel.com
- Counsel to Individual Debtors: Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- Counsel to Party in Interest: David B Shemano dshemano@shemanolaw.com
- Counsel to Corporate Debtors: Derrick Talerico dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com,admin@wztslaw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Counsel to Archway: Gerrick Warrington gwarrington@frandzel.com, achase@frandzel.com
- Counsel to Party in Interest: Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com



☐ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 12/24/24, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Vincent P. Zurzolo  
U.S. Bankruptcy Court  
255 E. Temple Street  
Bin Outside of Suite 1360  
Los Angeles, CA 90012

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 24, 2024

*Date*

Annette Chase

*Printed Name*

/s/ Annette Chase

*Signature*